

Law Office of Angus James Bell

30 Wall Street, 8th Floor New York, New York 10005

Tel: (212) 804-5765 Fax: (718) 504-6351

Email: ajamesbelllaw@gmail.com

July 8, 2021

Via ECF

Hon. Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Daniel Daniel*, 20Cr101

Mr. Ashmawy and I are the CJA appointed counsel for Mr. Daniel Daniel who plead guilty to Conspiracy to Commit Money Laundering and is awaiting sentencing that is scheduled for August 10th at 11:30 a.m. We write to request (1) that the Court authorize interim vouchers in this matter and (2) to seek an additional 50 hours for Mr. Ashmawy to continue as co-counsel.

As noted in our July 16, 2020 letter to the Court seeking Mr. Ashmawy's appointment, the Government produced more than 7 terabytes of discovery and counsels dedicated a significant number of hours reviewing and organize this material. Since Mr. Daniels plea we have turned our attention to preparing for his upcoming sentencing hearing that includes gathering and reviewing mitigation materials as well as preparing the defense sentencing submission. Mr. Ashmawy has now exceed the initial 100 hours approved by the Court and we are seeking approval for an additional 50 hours at a rate of \$90 per hour.

Additionally, given the volume of discovery and the fact that both counsels are solo practitioners, authorization of interim vouchers would assist in avoiding an economic hardship. I further submit that the additional 50 hours for Mr. Ashmawy is necessary for the effective representation of this indigent defendant and is consistent with the statutory authority for the provision of ancillary services in an appointed case.

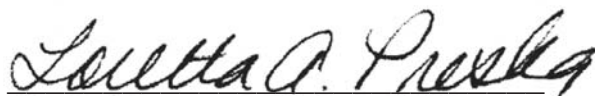
Thank you in advance for any and all consideration of this application. We will await further instructions from the Court on this matter.

Respectfully submitted,

A James Bell, Esq.

Cc: All counsel, by ECF

SO ORDERED.



LORETTA A. PRESKA, U.S.D.J.

Dated: July 9, 2021
New York, New York